



BORRELLI & ASSOCIATES

P.L.L.C.

www.employmentlawyernewyork.com

655 Third Avenue
Suite 1821
New York, NY 10017
Tel. No. 212.679.5000
Fax No. 212.679.5005

1010 Northern Boulevard
Suite 328
Great Neck, NY 11021
Tel. No. 516.248.5550
Fax No. 516.248.6027

March 9, 2015

Via Fax and ECF

The Honorable George B. Daniels
United States District Judge for the
Southern District of New York
500 Pearl Street
New York New York 10007
Fax: (212) 805-6737

SO ORDERED

The conference is adjourned to
March 31, 2015 at 9:30 a.m.

MAR 10 2015

George B. Daniels
HON. GEORGE B. DANIELS

Re: *Rafael Mota v. Bruckner Forever Young Social Adult Day Care Inc, et al.;*
Docket No. 15-CV-00064

Dear Judge Daniels:

This office represents the Plaintiff, Rafael Moto, in the above-referenced matter. As Your Honor is aware, an Initial Pretrial Conference is scheduled for tomorrow, Tuesday, March 10, 2015, at 9:30 a.m. However, even though all four Defendants in this matter have been served, no one has appeared or responded thus far. (The Affidavits of Service for the Summons and Complaint as well as the Proposed Pretrial Order have already been docketed, and the time to respond expires on March 18.) As such, we respectfully request that Your Honor adjourn the Initial Pretrial Conference for three weeks, until March 31, 2015, by which time we will have filed the necessary default judgment paperwork in the hopes that Your Honor can convert the initial conference into a default judgment hearing in the event that some or all of the Defendants have still failed to appear by that time.

We thank the Court for its attention to this matter.

Respectfully,

Vivian Walton

Vivian Walton, Esq.

VW:amm